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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SOUTHQUAY SHIPPING LTD.,

Plaintiff,

-against-

INTERNATIONAL OIL OVERSEAS INC.,

Defendant.

-----X

STATE OF NEW YORK)
 :
COUNTY OF NEW YORK) ss:

JUDGE CASTEL
ECF CASE

06 CV 15310
06 Civ.

AFFIDAVIT UNDER
SUPPLEMENT RULE B

JOHN R. KEOUGH, III, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and am an officer of Waesche, Sheinbaum & O'Regan, P.C., attorneys for the Plaintiff herein. I am familiar with the circumstances of the complaint and submit this affidavit in support of Plaintiff's request for the issuance of process of maritime attachment and garnishment of the property of the Defendant, INTERNATIONAL OIL OVERSEAS INC., a foreign business entity, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. The Defendant, INTERNATIONAL OIL OVERSEAS INC., is party to a maritime contract of charter party on which this claim is based, and is a foreign business entity organized and existing under the laws of a foreign country, with its office and place of business abroad.

3. Under my supervision, my office did a search of the New York Secretary of State, Division of Corporations; the Transportation Tickler; telephone assistance; and a general Internet search.

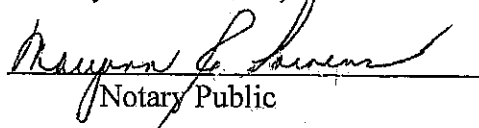
4. In our search, we did not find any listing or reference to the Defendant, INTERNATIONAL OIL OVERSEAS INC., in this District or within the State of New York. In the circumstances, I believe that the Defendant, INTERNATIONAL OIL OVERSEAS INC., cannot be found within this District.

5. Upon information and belief, the Defendant, INTERNATIONAL OIL OVERSEAS INC., has, or will have during the pendency of this action, tangible and/or intangible property within this District in the hands of ABN Amro, Atlantic Bank of New York, American Express Bank, Bank of America, BNP Paribas, Citibank, Deutsche Bank, HSBC, HSBC USA Bank NA, JPMorgan Chase Bank, Standard Chartered Bank, The Bank of New York, and/or Wachovia Bank.

6. This application is the Plaintiff's first request for such relief made to any court.


JOHN R. KEOUGH, III

Sworn to before me this
19th day of December, 2006


Notary Public

MARYANN C. POWERS
Notary Public, State of New York
No. 01PO4629292
Qualified in Richmond County
Commission Expires August 31, 2010